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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

LNV CORPORATION

Plaintiff,

v.

DENISE SUBRAMANIAM

pro per

Defendant

Civil Case No. 3:14-cv-01836 -MO

**DEFENDANT'S OBJECTION TO
PLAINTIFF'S MOTON FOR
SUMMARY JUDGMENT**

**DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTON FOR SUMMARY
JUDGMENT**

Here comes Defendant Denise Subramaniam, representing herself, and incorporates herein all her prior pleadings in these two noticed related cases Subramaniam v. Beal et al, Case No. 3:12-cv-01681-MO and Subramaniam v. Beal Case No: 3:2014cv01482 and all her pleadings in the present case; she also incorporates herein her Notice of Constitutional Questions and the Notices of Constitutional Questions filed by the other pro-se litigants opposing LNV Corporation ("LNV") in the noticed related cases; and states the following:

Summary judgment at this conjecture would be a violation to Defendant's constitutional rights to due process to equal protection of law under the fifth and fourteenth amendments to the United States Constitution. (See Defendant's constitutional challenge to Federal Rule 56 in her Notice of Constitutional Questions.)

“These phrases [due process] in the constitution do not mean the general body of the law, common and statute, as it was at the time the constitution took effect; for that would seem to deny the right of the legislature to amend or repeal the law. They refer to certain fundamental rights, which that system of jurisprudence, of which ours is a derivative, has always recognized.” Brown v. Levee Com'rs, 50 Miss. 468. "Due process of law, as used in the constitution, cannot mean less than a prosecution or suit instituted and conducted according to the prescribed forms and solemnities for ascertaining guilt, or determining the title to property." Embury v. Conner, 3 N.Y. 511, 517, 53 Am.Dec. 325. And see, generally, Davidson v. New Orleans, 96 U.S. 104, 24 L.Ed. 616.

The bottom line is that facts specific to the title of Defendant's property are in dispute between the parties. Defendant has overcome the burden of presumption courts give to records from county recorders' offices (See Defendant's Motion for Judicial Notice of the criminal conviction of Lorraine Brown.)

Defendant claims the instruments LNV/Beal have presented to this court (i.e. assignment of deed of trust and the Mortgage Note and allonges to the Note) are in fact forgeries. Without discovery and the opportunity to have these instruments examined by a professional forensic document examiner to conclusively determine the authenticity of said instruments this court can in no way determine the authenticity of said instruments and hence the dispute of title.

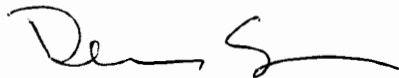
This court already denied Defendant her constitutional rights to due process to equal protection of law under the fifth and fourteenth amendments to the United States Constitution by summarily granting dismissal of her claims against D. Andrew Beal, LNV Corporation, ("LNV"); MGC Mortgage Inc. ("MGC"); Beal's LPS agents RCO Legal ("RCO") and

Northwest Trustee Services (“NWTs”); and Beal’s predecessors JPMorgan Chase as corporate parent of EMC Mortgage Inc. and successor to Bear Stearns; Litton Loan Servicing and others in Subramaniam v. Beal without adjudicating facts or applying law specific to title of her property or any of Defendant’s other claims.

D. Andrew Beal evaded service and LNV never even made an appearance in Subramaniam v. Beal. Defendant who is disabled became incapacitated in or around March and remained incapacitated through May or June of 2013 as a direct result of her disabilities. She moved the court for a medical continuance and provided copies of her medical records via an in camera motion, so as not to make them open to the public; but the court denied her motion and dismissed her case with prejudice with no finding of fact or conclusion of law to support such a summary judgment.

Defendant reserves the right to amend this objection and to file a memorandum of law in support of it and her Notice of Constitutional Questions which more fully expresses her objection to a summary judgment.

Respectfully Submitted,



Denise Subramaniam


CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record, pro-se parties and the United States Attorney General and the Attorney General of the State of Oregon via the Court's CM/ECF system, email, and/or regular mail, and/or certified mail with return receipt requested.

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Respectfully Submitted,



Denise Subramaniam